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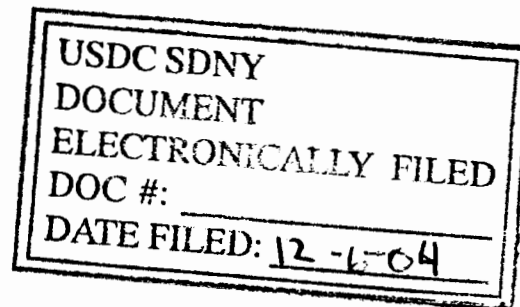
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December 1, 2004

HAND DELIVERY

The Honorable Richard Conway Casey
United States District Court Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1350
New York, New York 10007-1312



**Re: *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (RCC)
Ashton, et al. v. Al Qaeda Islamic Army, et al., 02-CV-6977 (RCC)
Barrera, et al., v. Al Qaeda Islamic Army, et al., 03-CV-7036 (RCC)**

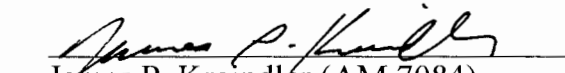
Dear Judge Casey:

We are writing to request your Honor's permission to consolidate the *Barrera* case with *Ashton*; each case contains identical facts, legal issues, and named defendants. The *Barrera* complaint was filed in the Southern District of New York on September 10, 2003 and assigned to your Honor's docket as related to *Ashton* on October 16, 2003. *Barrera* was subsequently consolidated with the MDL action (03-MDL-1570) on March 10, 2004.

In the interest of judicial economy, we respectfully request that all prior and forthcoming docket entries (e.g., motions, orders, stipulations) filed in *Ashton* also apply retroactively and concurrently with *Barrera*. We have circulated this proposal to defense counsel, who have not expressed any objection and/or prejudicial concern.

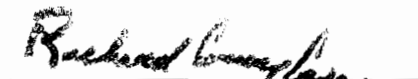
Accordingly, we respectfully request your Honor's endorsement of this proposed Order of Consolidation.

Respectfully submitted,


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cc: All counsel (via e-mail)

IT IS SO ORDERED.


The Honorable Richard C. Casey
United States District Court Judge

Dec. 6, 2004